

## DECISION MEMORANDUM

**TO:** COMMISSIONER KJELLANDER  
COMMISSIONER REDFORD  
COMMISSIONER SMITH  
COMMISSION SECRETARY  
COMMISSION STAFF  
LEGAL

**FROM:** NEIL PRICE  
DEPUTY ATTORNEY GENERAL

**DATE:** JANUARY 13, 2012

**SUBJECT:** APPLICATION OF TC SYSTEMS, INC. FOR REGISTRATION AS A  
WHOLESALE TELECOMMUNICATIONS PROVIDER IN IDAHO, CASE  
NO. TCS-T-11-01

On November 22, 2011, TC Systems, Inc. (“TCS” or “Company”) filed an Application, pursuant to Commission Rule 114, IDAPA 31.01.01.114, as clarified in Procedural Order No. 32277 in Case No. GNR-T-11-01, to be recognized by the Commission as a telecommunications company that does not intend to provide basic local exchange service. *Application* at 1.

### THE APPLICATION

TCS is a Delaware corporation and lists its principal place of business as Bedminster, NJ. *Id.* at 1. TCS is registered with the Idaho Secretary of State as a foreign corporation and lists CT Corporation System, 111 W. Jefferson, Suite 530, Boise, Idaho 83702, as its Idaho registered agent for service. *Id.* at 2, Exhibit 2.

In its Application, TCS states that it is a “competitive telecommunications company that intends to offer wholesale transport service to one of its affiliates in the state of Idaho.” *Id.* at 1. TCS advises that it “has contacted CenturyLink and will initiate interconnection negotiations upon submission of this application.” *Id.* at 4. The Company “has reviewed the Commission’s rules governing telecommunications services in Idaho” and commits to providing “service in accordance with these rules to the extent they are not preempted by the Federal Act.” *Id.* The Company also “acknowledges that as a non-paging telecommunications carrier in the

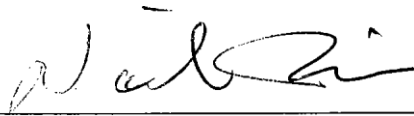
State of Idaho, Applicant will be subject to numbering conservation measures, including mandatory one thousand (1,000) block pooling, pursuant to Commission Order No. 30425.” *Id.*

#### **STAFF RECOMMENDATION**

Staff has reviewed TCS’ Application and other supporting documentation and recommends that the Application be processed through Modified Procedure with a corresponding 21-day comment period.

#### **COMMISSION DECISION**

Should TCS’ Application for registration as a wholesale telecommunications provider be processed through Modified Procedure with a corresponding 21-day comment period?

A handwritten signature in black ink, appearing to read "Neil Price", is written over a horizontal line.

Neil Price  
Deputy Attorney General

M:TCS-T-11-01\_np